REMARKS

Claims 29-33 are pending in the present application. Claim 1-28 have been canceled. Claims 29 –33 have been rejected. Claims 31-33 have been amended. Applicants respectfully submit that the claims as presented are in condition for allowance. Applicants respectfully request reconsideration based on the following remarks.

Claim Objections

The informalities in the claims have been corrected as suggested by the Examiner. Applicants respectfully request reconsideration and withdrawal of the objections.

Claim Rejections - 35 U.S.C. § 101

Claim 33 is rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Claim 33 has been amended to recite "the storage medium not including transmission media" thus, excluding the non-statutory subject matter of a transmission media. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection.

Claim Rejections - 35 U.S.C. § 103

Claims 29-33 are rejected under 35 U.S.C. 103(a) as being unpatentable over "Automatic Generation of Simulation Models from Neutral Libraries: An Example" by Son et al. ("Son") in view of US Patent No. 7,103,562 to Kosiba et al. ("Kosiba"). This rejection is respectfully traversed.

With reference first to the Son reference, although at a first glance Son appears to disclose elements of the claimed invention, Applicants respectfully submit that when the invention is evaluated as a whole, Son does not disclose the claimed invention. According to MPEP 2106(II) C, when evaluating a claim, USPTO personnel may not dissect a claimed invention into discrete elements and then evaluate the elements in isolation. Instead, the claim as a whole must be considered. See, e.g., Diamon v. Diehr, 450 U.S. 175, 188-89, 209 USPQ 1, 9 (1981).

In particular, claim 29 recites,

"a model template defined by a plurality of tables, where **each** table is defined by one or more of entity parameters, task parameters, and resource parameters **and** where **each** table includes a mapping to one or more other tables of the plurality of tables;

a database that stores **the** model template and **the** plurality of tables;

a model application in communication with the database and which receives commands from a user, and, in response to the commands, builds a simulation model by retrieving **the** model template **and the plurality of** tables, by **automatically associating** entity, task, and resource input data **from a business database system** with **the** model template, and by **automatically performing allocations** of the resource input data to the task parameters;

an optimizing application in communication with the model application and which receives commands from a user, and, in response to the commands, selects one or more of the entity parameters, the task parameters, and the resource parameters of the simulation model and an objective function, defines bounds of the selected one or more of the entity parameters, the task parameters, and the resource parameters, and generates values for the objective function;

a server that performs a simulation of the process by processing the simulation model, and based on the simulation, generates an output data file containing output data representative thereof."

Applicants respectfully submit that Son does not disclose, teach, or suggest the bolded limitations of claim 29. The invention recited in claim 29 distinguishes from the cited art in that it provides for a single model template that is useful for an "endless variety of business processes." Whereas, the cited art operates on multiple templates form various entities to build a simulation model.

More specifically, with regard to the model template element, although Son discloses models, templates, and tables, Applicants respectfully submit that Son does not disclose the

model templates and the tables as recited in claim 29.

The Examiner relies on Figures 3 and 4 of Son to disclose the model template and the plurality of tables as recited in claim 29. As best understood by Applicants, Figure 3 illustrates database tables associated with a model (EXPRESS). The model is the schema shown in section 4.1 which is derived from information objects described in section 3.1-3.6. Son refers more generally to the information objects as simulation components or simulation objects in section 1. Introduction and in Figure 1. Thus, in Son, the terms tables, information objects, simulation components, and simulation objects are all referring to the same thing, a database structure that can store a neutral representation of model data. (see, for example, the Abstract) Figure 4 illustrates tables populated with database information. Thus, the tables in Figure 3 are template tables. The tables in Figure 4 are populated tables.

The collection of tables of Figure 3 could be viewed as a template that includes a plurality of template tables. However, the collection of tables of Figure 3 still does not include the tables as specifically recited in claim 29. In particular, each table as shown in Figure 3 does not include an entity parameter, a task parameter, a resource parameter, and a mapping as recited in claim 29. Rather, at best, only a subset of the tables include a mapping, and this subset does do not include a task parameter, a resource parameter, or an entity parameter. Thus, even considering the collection of tables or schema as a template, Son still fails to disclose where **each** table is defined by one or more entity parameters, task parameters, and resource parameters, **and** where **each** table includes a mapping to one or more other tables of the plurality of tables. Thus, Son fails to disclose the model template and the plurality of tables as recited in claim 29.

Moreover, because Son fails to disclose the model template and tables as recited in the first element, Son fails to disclose a database that stores the model template and the plurality of tables and a model application the retrieves the model template and the plurality of tables.

Even if the schema and tables of Figure 3 were to be considered as the model template and the plurality of tables, Applicants respectfully submit that Son still fails to disclose a model application element as recited in claim 29.

The Examiner relies on the model builder as described in section 5 to disclose the model application as recited in claim 29. As best understood by Applicants, the model builder of Son builds a simulation model based on the populated tables ("stations" table and "jobs" table of Figure 4), templates (a location template, a process template, a routing template, an arrivals template), and an initialization file.

The model templates or templates, as referred to by Son in the Abstract, section 1, and sections 5.1-5.3 are commercial based templates for translating the neutral representation of the model data to commercial simulation packages. The templates are part of the commercial model builders (Arena, ProModel, etc.). The templates are not defined by the plurality of tables shown in Figure 3. Thus, the templates disclosed in Son are not are not the model template. Thus, Son fails to disclose retrieving **the** model template as recited in claim 29.

As discussed above, the populated tables are not the template tables of Figure 3, rather they are the populated tables of Figure 4. Thus, Son fails to disclose retrieving **the** plurality of tables that are stored in **the** database.

Moreover, as discussed above, the tables used to build the simulation model in Son are the populated tables of Figure 4. The tables were populated by hand (4.3 database for Example System) before even being retrieved by the model builder. Thus, the model builder does not **automatically associate** data with the tables or the model template. (see paragraph [0066] of the present application, "input from a suitable source" and "the model is generated") Moreover, the data is merely populated by hand and is not populated from a business database system, which is distinct from the database that stores the template and tables. Thus, Son fails to disclose **automatically associating** entity, task, and resource input data **from a business**

database system with **the** model template. Likewise, Son fails to disclose **automatically performing allocations** of **the** resource input data to **the** task parameters as this all performed, it at all, by hand.

With regard to the optimizing application element, the Examiner submits and the Applicants agree that Son fails to disclose this element and the corresponding limitations.

Applicants respectfully submit that Kosiba fails to disclose, teach, or suggest all of the deficiencies of Son. Thus, even in combination with Kosiba, the references fail to disclose, teach, or suggest every element of claim 29 as recited in the claim. For at least this reason, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 29.

Claims 32 and 33 similarly distinguish over the cited art. For at least this reason, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 32 and 33.

Claims 30 and 31 depend from independent claim 29 and for at least the reasons discussed above distinguish over the cited art. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 30 and 31.

Conclusion

In the event the Examiner has any queries regarding the instantly submitted response, the undersigned respectfully request the courtesy of a telephone conference to discuss any matters in need of attention.

If there are any additional charges with respect to this response or otherwise, please charge them to Deposit Account No. 07-0868.

Respectfully submitted,

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